

MEMO ENDORSED

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Diane Fischer,
of counsel

December 10, 2020

Honorable Kenneth M. Karas
United States District Judge
United State District Court
300 Quarropas Street
White Plains, NY 10601

Re: *United States v. Jeffrey Crossland et. al.*, 19-cr-645 (KMK)

Dear Judge Karas:

I am writing to request an extension of the defendants' time to file their pretrial motions. Because the defendants are all out on bail and this is the first request for an adjournment of the filing date (we do not anticipate another), I am requesting an additional 30 days, from December 18, 2020 until January 18, 2021. Co-defendants Parente and Robinson join in this request and the Government does not object.

On behalf of Mr. Crossland, we have identified several potential issues for motions, including suppression, but they may not all survive our continued fact investigation and legal research. The additional time will allow us to pinpoint and refine the meritorious issues.

Thank you for your consideration.

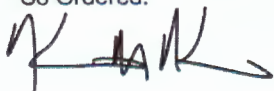
Very truly yours,

S/

SUSAN C. WOLFE

Granted. The deadline for Defense motions is extended until January 18, 2021. Time is excluded until then, in the interests of justice, to allow counsel to fully research the putative motions and these interests outweigh the public's and Defendants' interest in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.



12/11/20